

Exhibit P



Deposition of:
Robert McMeeking , Ph.D.

July 6, 2017

In the Matter of:
**In Re: Bard IVC Filters Products
Liability**

Veritext Legal Solutions

1075 Peachtree St. NE , Suite 3625

Atlanta, GA, 30309

800.808.4958 | calendar-atl@veritext.com | 770.343.9696

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1 that?

2 A No.

3 MR. O'CONNOR: Form.

4 BY MS. DALY:

5 Q Nor did you do it with the Denali
6 laser cut from a nitinol tube that also has
7 anchors?

8 MR. O'CONNOR: Form.

9 THE WITNESS: I didn't do any of those
10 analyses because it's my assessment that those
11 changes did not make a significant difference
12 to the -- to the filters in terms of reducing
13 the danger that they present because of their
14 failures.

15 BY MS. DALY:

16 Q Are you giving the opinion that the Simon
17 nitinol is an alternative safer product than the
18 Bard retrievable products?

19 MR. O'CONNOR: Form.

20 THE WITNESS: I'm offering the opinion
21 that in the setting of permanent use of a filter,
22 which the Recovery and the G2 and its successors
23 can -- can be used as, that the Simon nitinol is a
24 safer alternative.

25 BY MS. DALY:

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1 Q But you would agree that the Simon nitinol
2 will not serve populations of people whose doctors
3 believe they need a retrievable filter, true?

4 MR. O'CONNOR: Form.

5 THE WITNESS: I'm -- I'm not offering that
6 opinion. Was that -- could you ask the question
7 again?

8 MS. DALY: Can you read that question.

9 (Record read Lines 1-3.)

10 MR. O'CONNOR: Form.

11 THE WITNESS: Well, since I'm not a
12 medical doctor and I can't really answer that
13 question properly, but since it's -- since it's
14 represented as a permanent filter, that would
15 suggest that it's not meant to be used in
16 situations where retrievability is -- is advised by
17 the doctor.

18 BY MS. DALY:

19 Q The Simon nitinol isn't?

20 A The Simon nitinol.

21 Q Okay. Did you make any effort to look at
22 modifications that would have had to be made to the
23 Simon nitinol filter to allow it to maintain what
24 you conclude is low complications rate but make it
25 percutaneously retrievable?

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1 A No --

2 MR. O'CONNOR: Form.

3 THE WITNESS: -- I didn't look at that.

4 MR. O'CONNOR: Okay. When you get to a
5 place where we can take a quick break?

6 MS. DALY: Yeah. Almost.

7 MR. O'CONNOR: Okay.

8 MS. DALY: This is a good break point.

9 MR. O'CONNOR: Oh, great.

10 MS. DALY: Can you tell us what our time
11 is.

12 THE VIDEOGRAPHER: This is the end of
13 Media No. 3. We are going off record at 1454.

14 (Recess taken.)

15 THE VIDEOGRAPHER: This is the beginning
16 of Media No. 4. We are back on the record at 1508.
17 BY MS. DALY:

18 Q Dr. McMeeking, have you performed any
19 actual tests on Bard retrievable filters to
20 determine if an interrelatedness of complications
21 actually exists?

22 A Do you mean a bench test or --

23 Q Yes.

24 A -- an experiment of some kind?

25 I have not carried out any experiments on